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Attorneys for Defendant

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

**COLUMBIA SPORTSWEAR NORTH
AMERICA, INC.,** an Oregon corporation,

PLAINTIFF,

v.

**SEIRUS INNOVATIVE ACCESSORIES,
INC.,** a Utah corporation,

DEFENDANT.

No. 3:15-cv-64

**DEFENDANT SEIRUS INNOVATIVE
ACCESSORIES, INC.'S NOTICE OF
MOTION AND MOTION TO DISMISS
OR, ALTERNATIVELY, TRANSFER
VENUE TO THE SOUTHERN DISTRICT
OF CALIFORNIA**

ORAL ARGUMENT REQUESTED

LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1, counsel for Defendant Seirus Innovative Accessories, Inc. (“Seirus”) certifies that it made a good faith effort to resolve the issues raised in this Motion and its accompanying memorandum. Those efforts included at least one telephone conference and an exchange of e-mails with Plaintiff’s counsel. Counsel for the parties were unable to resolve this dispute.

MOTION

Defendant Seirus Innovative Accessories, Inc. (“Seirus”) respectfully moves this Court to dismiss this case for improper venue under Federal Rule of Civil Procedure 12(b)(3). Alternatively, Seirus moves the Court to transfer this case to the U.S. District Court for the District of California pursuant to 28 U.S.C. § 1404(a).

This Motion is supported by Seirus’ Memorandum in Support, the declarations of Matthew D. Murphey, Joseph Edwards (filed under seal), Michael Carey and Wendy Carey, and any exhibits attached thereto. This motion is made in good faith and not for purposes of delay.

DATED: February 27, 2015.

TROUTMAN SANDERS LLP

s/ Matthew D. Murphey

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Attorneys for Defendant Seirus Innovative
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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2015, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court of Oregon by using the CM/ECF system. Participants in this case No. 3:15-cv-64 who are registered CM/ECF users will be served by the CM/ECF system. To the extent any documents relevant to this matter are filed under seal, I certify that full and unredacted copies of such documents will be served on counsel of record for Plaintiff.

s/ Matthew D. Murphey
Matthew D. Murphey